

ECF CASE  
JUDGE PATTERSON

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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**J & J SPORTS PRODUCTIONS, INC.,** as  
Broadcast Licensee of the **May 5, 2007**  
**DeLaHoya/Mayweather** Program

Plaintiff,

-against-

FIORDALIZA ALVAREZ, Individually, and as  
officer, director, shareholder and/or principal of  
C & F ENTERPRISES INC. d/b/a LA PALMA  
BAR & GRILL a/k/a ESCOBAR a/k/a ESCO BAR,

and

C & F ENTERPRISES INC. d/b/a LA PALMA  
BAR & GRILL a/k/a ESCOBAR a/k/a ESCO BAR

Defendants.  
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**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

Civil Action No. 07-cv-08852

HON. ROBERT P. PATTERSON

**PLEASE TAKE NOTICE** that upon the affirmation of Julie Cohen Lonstein, sworn to  
on the 6<sup>th</sup> day of February 2008, in support of said application and the exhibits attached  
thereto, Plaintiff moves this Court for an order granting the entry of default judgment against the  
Defendants jointly and severally as follows:

**Against, FIORDALIZA ALVAREZ, Individually, and as officer, director, shareholder  
and/or principal of C & F ENTERPRISES INC. d/b/a LA PALMA BAR & GRILL a/k/a  
ESCOBAR a/k/a ESCO BAR,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN  
THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE  
HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for  
Defendant's willful violation of 605(a)

- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SEVENTY FIVE DOLLARS (\$675.00)

**Against, C & F ENTERPRISES INC. d/b/a LA PALMA BAR & GRILL a/k/a ESCOBAR a/k/a ESCO BAR,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SEVENTY FIVE DOLLARS (\$675.00)

Dated: February 6, 2008  
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein  
Julie Cohen Lonstein  
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